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And Allied National, Inc.*

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

CHARLES M. BUTLER, III, and
CHOLE BUTLER,

Plaintiffs,

vs.

UNIFIED LIFE INSURANCE
COMPANY; HEALTH PLANS
INTERMEDIARIES HOLDINGS,
LLC, D/B/A HEALTH INSURANCE
INNOVATIONS; HEALTH
INSURANCE INNOVATIONS, INC.;
ALLIED NATIONAL, INC.;
NATIONAL BROKERS OF
AMERICA, INC.; THE NATIONAL
CONGRESS OF EMPLOYERS, INC.;
and DOES 1-10,

Defendants.

UNIFIED LIFE INSURANCE
COMPANY AND ALLIED
NATIONAL, INC.,

Cause No.: CV 17-50-SPW-TJC

**UNIFIED LIFE INSURANCE
COMPANY'S UNOPPOSED
MOTION FOR PARTIAL
DEFAULT JUDGMENT
NATIONAL BROKERS OF
AMERICA**

Crossclaimants and)
Third- Party Claimants,)
)
vs.)
)
HEALTH PLANS INTERMEDIARIES)
HOLDINGS, LLC, D/B/A HEALTH)
INSURANCE INNOVATIONS;)
HEALTH INSURANCE)
INNOVATIONS, INC.)
)
Crossclaim Defendant,)
)
and)
)
NATIONAL BROKERS OF)
AMERICA, INC.,)
)
Crossclaim Defendant,)
)
and)
)
MULTIPLAN, INC.)
)
Third-Party Defendant.)

COMES NOW Defendant/Crossclaimant Unified Life Insurance Company (“Unified”) and respectfully moves for entry of Partial Default Judgment against National Brokers of America, Inc. (“NBoA”). This Motion is supported by accompanying Memorandum of Law. Counsel for all parties who have appeared have been contacted and have consented to this request. A proposed partial default judgment is provided herewith.

DATED this 19th day of December, 2018.

By: /s/ Robert L. Sterup
Robert L. Sterup
BROWN LAW FIRM, P.C.
*Attorneys for Defendants,
Crossclaimants and Third-Party
Claimants Unified Life Insurance
Company and Allied National, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2018, a copy of the foregoing was electronically filed and served on the following persons by the following means:

<u>1-4</u>	CM/ECF	_____	Fax
_____	Hand Delivery	_____	E-Mail
_____	Mail	_____	Overnight Delivery

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By: /s/ Robert L. Sterup

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